

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

HEADWATER RESEARCH, LLC., (CAUSE NO. 22:2-CV-422-JRG
)
Plaintiff, ()
vs. ()
SAMSUNG ELECTRONICS CO., LTD., ()
et al., () MARSHALL, TEXAS
(JANUARY 13, 2025
Defendants.) 9:00 A.M.

VOLUME 1

TRIAL ON THE MERITS

BEFORE THE HONORABLE RODNEY GILSTRAP
UNITED STATES CHIEF DISTRICT JUDGE
and a jury

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1 A. It looks like a presentation or something from some
2 point.

3 Q. Actually I believe it's your website.

4 A. Okay.

5 Q. I've had an opportunity to Google Headwater yesterday
6 when I was preparing for this conversation. Does that look
7 like your website?

8 A. Yes, ma'am. It's been a while since I looked at it.

04:34 9 Q. Okay. All right. And when you take a look at your
10 website, we see, "Headwater is a focused team of highly
11 experienced engineers, scientists, technologists, dedicated to
12 inventing and developing significant technological
13 breakthroughs."

14 Do you see that, sir?

15 A. I do.

16 Q. But the reality -- stepping aside from what you're
17 representing to the public, the world, the reality is it's you
18 and an office manager. Correct?

19 A. No, ma'am.

04:35 20 Q. Operations manager. I apologize. Two employees.
21 Correct?

22 A. Yes, two employees.

23 Q. Okay. And the operations are trying to get people to use
24 your patent. Correct?

25 A. That's not the whole story, ma'am.

04:35 1 Q. Well, you've got two employees at Headwater, Doctor. One
2 of them's an operations manager, and you told this jury that
3 your main focus now is licensing. Correct?

4 A. Yes, ma'am.

5 Q. All right.

6 A. That's our business model.

7 Q. All right.

8 MS. SMITH: You can take that slide down.

9 Q. (BY MS. SMITH) Now, you founded Headwater back in
10 California. Correct?

11 A. Yes, ma'am; originally.

12 Q. Okay. Originally. But before suing Samsung in 2022, you
13 rented a few rooms in Tyler, Texas. Correct?

14 A. We moved a long time ago, ma'am, yes.

04:35 15 Q. Was a long time ago before you sued Samsung in Texas?

16 A. Yes, ma'am.

17 Q. All right. And you work there sometimes. Fair?

18 A. Yes.

19 Q. A few times a year?

20 A. Something like that, ma'am.

21 Q. Well, you certainly -- you don't own a home in Texas
22 currently, do you, sir? Doctor.

23 A. No, ma'am.

24 Q. And you've never owned a home in Texas. Correct?

25 A. No, ma'am.